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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE
IN SUPPORT OF ADVERTISER
PLAINTIFFS' MOTION TO EXCLUDE
OPINION TESTIMONY OF DR.
CATHERINE TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude Opinion
7 Testimony of Dr. Catherine Tucker.

8 3. Attached as **Exhibit 1** is a true and correct copy of excerpts from the certified transcript
9 of the February 28, 2024 Deposition of Catherine Tucker.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Advertiser Merits Report of
11 Catherine Tucker Errata, dated January 16, 2024.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Advertiser Merits Rebuttal Report
13 of Catherine Tucker, dated February 9, 2024.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Expert Merits Report of Michael
15 A. Williams, Ph.D., dated January 12, 2024.

16 7. Attached as **Exhibit 5** is a true and correct copy of the Expert Merits Rebuttal Report of
17 Michael A. Williams, Ph.D., dated February 9, 2024.

18 8. Attached as **Exhibit 6** is a true and correct copy of a document produced by Meta in this
19 litigation with the Bates Number PALM-012438930.

20 9. Attached as **Exhibit 7** is a true and correct copy of PX 581 and PX 582, which are a
21 parent email and attachment produced in this litigation by Meta, marked as exhibits at the deposition of
22 Jon Eide.

23 10. Attached as **Exhibit 8** is a true and correct copy of class certification Expert Reply
24 Report of Michael A. Williams, Ph.D., dated September 15, 2023.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 5,
26 2024, in Austin, Texas.

27 /s/ Brian J. Dunne
28 Brian J. Dunne